

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
Petition of AT&T Services, Inc. for Forbearance	)	WC Docket No. 16-363
Under 47 U.S.C. § 160(c) from Enforcement of	)	
Certain Rules for Switched Access Services and Toll	)	
Free Database Dip Charges	)	

**CENTURYLINK REPLY COMMENTS  
TO AT&T FORBEARANCE PETITION**

CenturyLink<sup>1</sup> hereby submits these reply comments regarding AT&T's September 30, 2016 Petition for Forbearance (AT&T Petition)<sup>2</sup> as follows:

The multitude and extent of comments filed in the initial round in response to the AT&T Petition confirm that, with respect to both the tandem switching/transport and database query aspects of the forbearance relief sought, a more targeted approach outside of the forbearance context will more effectively address the underlying concerns. CenturyLink does not agree with all of the content of the comments filed. But, collectively, they effectively demonstrate the broad variety of concerns at issue both in the context of the AT&T Petition and the broader ICC reform issues that remain pending in the Commission's ICC FNPRM docket. For all, a more balanced approach will be needed. Specifically with regard to the forbearance relief sought in the AT&T Petition regarding tandem charges, the Commission should clarify that it is unlawful for

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<sup>1</sup> This submission is made by and on behalf of CenturyLink, Inc. and its subsidiaries.

<sup>2</sup> Public Notice, WC Docket No. 16-363, Pleading Cycle Established for Comments on AT&T's Petition for Forbearance from Certain Tariffing Rules, DA 16-1239 (rel. Nov. 2, 2016); Petition of AT&T Services, Inc. for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain Rules for Switched Access Services and Toll Free Database Dip Charges, WC Docket No. 16-363, Petition of AT&T Services, Inc. for Forbearance Under 47 U.S.C. § 160(c) (filed Sep. 30, 2016) (AT&T Petition).

terminating carriers to refuse direct interconnection to IXC's – while also simply clarifying that tandem rates are subject to the CLEC benchmark rule.<sup>3</sup> Together, these steps will help ensure that IXC's have the ability to avoid intermediary tandem charges to begin with and that, when they do use tandem services, rates are not excessively high. Similarly, by clarifying that database query charges are subject to the CLEC benchmark rule, the Commission can accomplish a more effective solution to the problem underlying the AT&T Petition request for relief regarding those services.

For the reasons stated above, CenturyLink respectfully requests that the Commission take the action described herein and in its initial comments filed on December 2, 2016.

Respectfully submitted,

**CENTURYLINK, INC.**

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<sup>3</sup> This aspect of CenturyLink's request asks merely for a clarification that all CLEC tandem rates are subject to the CLEC benchmark rule.